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Attorney for Advanced Scaffold Services LLC

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re: Hollister Construction

Services LLC

Chapter 11

Case No.: 19-27439 (MBK)

Hearing Date: December 19, 2019

at 10:00 a.m.

Objection Deadline:

December 12, 2019

NOTICE OF MOTION OF ADVANCED SCAFFOLD SERVICE LLC FOR ENTRY OF AN ORDER COMPELLING THE DEBTOR TO ASSUME OR REJECT EXECUTORY CONTRACT PURSUANT TO 11 U.S.C. §365 AND IF CONTRACT IS REJECTED LIFTING THE AUTOMATIC STAY, TO THE EXTENT IT APPLIES, TO ALLOW THE REMOVAL OF EQUIPMENT FROM THE PROJECT LOCATED AT 285 MADISON AVENUE, MADISON, NEW JERSEY.

Advanced Scaffold Services LLC ("Advanced Scaffold"), by and through its undersigned counsel hereby submits this motion for entry of an Order compelling the debtor to assume or reject executory contract with Advanced Scaffold within five (5) days of the date of an Order granting the motion and if the contract is rejected, or if debtor takes no action on the contract within said five (5) days, lifting the automatic stay, to the extent it

applies, to allow Advanced Scaffold to remove its equipment from the construction project known as "Ironside" located at 285 Madison Avenue, Madison, New Jersey. In support of the motion, Advanced Scaffold will rely upon the certification and memorandum of law filed concurrently herewith and the proposed Order.

If you do not want the bankruptcy court to issue an Order granting the motion or if you want the court to consider your views on the motion then on or before December 12, 2019 you or your attorney must file an objection with the Clerk of the Court at United States Bankruptcy Court, District of New Jersey, 402 East State Street, Trenton, New Jersey 08608.

If you mail your objection to the court for filing you must mail it early enough so the court will receive it on or before the date stated above.

Deliver a copy of your objection (a) to counsel to Advanced Scaffold at the following addresses: Lawrence B. Diener, 25 Main Street, Suite 200, Hackensack, New Jersey 07601, telephone 201-342-6137, facsimile 201-342-6126, Internet LBDiener@optimum.net, and (b) to all parties requesting notice in this case.

Attend the hearing schedule to be heard on December 19, 2019 at 10:00 a.m. before the Honorable Michael B. Kaplan, U.S.B.J., United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608.

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If you or your attorney do not take these steps, the court may decide that you did not oppose the relief sought in the motion and may enter an order granting that relief.

/s/ Lawrence B. Diener Dated: November 26, 2019

Lawrence B. Diener

Attorney for Advanced Scaffold Services LLC